

EXHIBIT 8

From: [Bruno, Matthew](#)
To: [Kevin A. Fritz](#); [Bender, Kristin](#); [Bryan Freedman](#); [Kristin Tahler](#); [Nicholas Inns](#); [daniellelazarus@quinnemanuel.com](#); [maarenchoksi@quinnemanuel.com](#); [Mitch Schuster](#); [Amit Shertzer](#); [Summer Benson](#); [Birtha Vaneta](#); [Miles Cooley](#); [Cortni Davis](#); [Jose Perez](#); [Jason Sunshine](#); [mitra@ahouraianlaw.com](#); [Theresa Troupson](#); [Joel Glover](#); [Babcock, Chip](#); [Kim Zeldin](#); [Ellyn Garofalo](#)
Cc: [Gottlieb, Michael](#); [Hudson, Esra](#); [Roeser, Stephanie](#); [Nathan, Aaron E.](#); [Connolly, Michaela](#); [Taustine, Melissa](#); [Meryl Governski](#); [Climaco, Katelyn](#)
Subject: RE: Lively v. Wayfarer Studios, et al. 24-cv-10049
Date: Wednesday, July 30, 2025 7:04:29 AM
Attachments: [image003.png](#)
[image001.png](#)
[2025.07.29 B.L. Deficiency Letter to Sarowitz.pdf](#)
[2025.07.29 B.L. Deficiency Letter to Baldoni.pdf](#)
[2025.07.29 B.L. Deficiency Letter to Wayfarer.pdf](#)
[2025.07.29 B.L. Deficiency Letter to Abel.pdf](#)
[2025.07.29 B.L. Deficiency Letter re TAG Defendants.pdf](#)
[2025.07.29 B.L. Deficiency Letter to Heath.pdf](#)

*** **EXTERNAL EMAIL** ***

Kevin:

As part of today's conferral, please be prepared to address the issues raised in the deficiency letters we served yesterday (re-attached), as well as the Wayfarer Parties' privilege log, which was provided to us earlier this morning.

Many thanks,

Matt

Matthew F. Bruno

Partner

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From: Kevin A. Fritz <kaf@msf-law.com>

Sent: Tuesday, July 29, 2025 7:54 PM

To: [Bender, Kristin](#) <KBender@willkie.com>; [Bryan Freedman](#) <bfreedman@lftcllp.com>; [Kristin Tahler](#) <kristintahler@quinnemanuel.com>; [Nicholas Inns](#) <nicholasinns@quinnemanuel.com>; [daniellelazarus@quinnemanuel.com](#); [maarenchoksi@quinnemanuel.com](#); [Mitch Schuster](#) <ms@msf-law.com>; [Amit Shertzer](#) <as@msf-law.com>; [Summer Benson](#) <sbenson@lftcllp.com>; [Birtha Vaneta](#) <vbirtha@lftcllp.com>; [Miles Cooley](#) <mcooley@lftcllp.com>; [Cortni Davis](#) <cdavis@lftcllp.com>; [Jose Perez](#) <jperez@lftcllp.com>; [Jason Sunshine](#) <jsunshine@lftcllp.com>; [mitra@ahouraianlaw.com](#); [Theresa Troupson](#) <ttroupson@lftcllp.com>; [Joel Glover](#) <jglover@jw.com>; [Babcock, Chip](#) <cbabcock@jw.com>; [Kim Zeldin](#) <kzeldin@lftcllp.com>; [Ellyn Garofalo](#) <egarofalo@lftcllp.com>

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Stephanie <SRoeser@manatt.com>; Bruno, Matthew <MBruno@manatt.com>; Nathan, Aaron E. <ANathan@willkie.com>; Connolly, Michaela <MConnolly@willkie.com>; Taustine, Melissa <MTaustine@willkie.com>; Meryl Governski <mgovernski@dirllp.com>; Climaco, Katelyn <KClimaco@manatt.com>

Subject: RE: Lively v. Wayfarer Studios, et al. 24-cv-10049

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Kristin:

We're available at 5pm EST on Wednesday.



Kevin A. Fritz

Partner

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From: Bender, Kristin <KBender@willkie.com>

Sent: Monday, July 28, 2025 5:02 PM

To: Kevin A. Fritz <kaf@msf-law.com>; Bryan Freedman <bfreedman@lftcllp.com>; Kristin Tahler <kristintahler@quinnemanuel.com>; Nicholas Inns <nicholasinns@quinnemanuel.com>; daniellelazarus@quinnemanuel.com; maarenchoksi@quinnemanuel.com; Mitch Schuster <ms@msf-law.com>; Amit Shertz <as@msf-law.com>; Summer Benson <sbenson@lftcllp.com>; Birtha Vaneta <ybirtha@lftcllp.com>; Miles Cooley <mcooley@lftcllp.com>; Cortni Davis <cdavis@lftcllp.com>; Jose Perez <jperez@lftcllp.com>; Jason Sunshine <jsunshine@lftcllp.com>; mitra@ahouraianlaw.com; Theresa Troupson <ttroupson@lftcllp.com>; Joel Glover <jglover@jw.com>; Babcock, Chip <cbabcock@jw.com>

Cc: Gottlieb, Michael <MGottlieb@willkie.com>; Hudson, Esra <EHudson@manatt.com>; Roeser, Stephanie <SRoeser@manatt.com>; Bruno, Matthew <MBruno@manatt.com>; Nathan, Aaron E. <ANathan@willkie.com>; Connolly, Michaela <MConnolly@willkie.com>; Taustine, Melissa

<MTaustine@willkie.com>; Meryl Governski <mgovernski@dirllp.com>; Katelyn Climaco <KClimaco@manatt.com>

Subject: Lively v. Wayfarer Studios, et al. 24-cv-10049

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Kevin,

On our meet and confer last Wednesday, you represented that Ms. Baldoni's production was supposed to be made last week. Please provide a date certain when the following third party productions will be made: Emily Baldoni, Roza Kalantari, Dion Suleman, Matthew Mitchell, and Matthew Ulawski. Additionally, please confirm that Ms. Barnes will be providing her production in connection with her R&Os due on the compliance date.

Further, we have reviewed the productions of Hanks, Toskovic, Musiol, Dang, Reese, Blackmon, Marbory, and Benson. Each appears deficient and requires more information. As outlined below, while each of these third parties agreed to produce documents relevant to the parties' claims and defenses that are responsive to each of the requests in the subpoenas respectively issued to them, a large number of the requests for production appear to have no documents produced. Please confirm that these third parties searched for responsive documents as to each of the requests issued to them—including phone records. If not, as to each third party, please identify which requests were objected to and for which the third parties did not search or produce in connection thereto in revised R&Os by **Thursday**. Additionally, none of these individuals provided any email correspondence from any email account. Please confirm that the only emails with responsive information were from Wayfarer-issued emails, and along similar lines (which does not appear to be the case). Further, please identify whether any information was withheld on the basis of privilege in connection with these third parties.

Further, please advise when you are available on **Wednesday** to meet and confer.

Hanks

- Please explain the start and end date range applied to the Hanks collection and search. It appears to range from approximately February 2024 through December 2024, but documents were requested from December 2022 to February 2025, when the subpoena was issued.
- The production is missing any responsive documents for RFP Nos. 5-12, 19, 20, and 22-26 (i.e., documents and communications regarding the Action, scenario planning document, the January 4, 2024 meeting, allegations and grievances, communications with or regarding Liner or Flaa, and phone and billing records). Please confirm that these requests were searched and there were no responsive materials.
- Hundreds of pages of text message communications that have been produced by other parties are missing from the production. *See, e.g.,*

WAYFARER_000140049; HEATH_000032704. Please explain what search terms were applied such that Hank's production is missing responsive communications.

Toskovic

- Please explain the start and end date range applied to the Toskovic collection and search, as the latest document is from August 30, 2024.
- The production is missing any responsive documents for RFP Nos. 4-6 (regarding communications and documents re Liner, content creators, and Jed Wallace/Street). Please confirm that these requests were searched and there were no responsive materials.
- Several text messages including Toskovic in other productions are also missing from this production. See, e.g., WAYFARER_000000001 (email from Abel to IEWU "team" sharing press coverage of the film on 11/26/2024); WAYFARER_000000005 (email from Audrey Hixon at Jonesworks to assorted Wayfarer and Jonesworks employees discussing Film trailer views on 5/22/2024); WAYFARER_000000021 (email from Hixon sharing IEWU press coverage on 4/16/2024). Please explain what search terms were applied such that Toskovic's production is missing responsive communications.
- Although some text messages appear linked to Toskovic's iCloud email account, milica.toskovic@icloud.com (see, e.g., TOSKOVIC_000000615), the production only includes text messages. Was the iCloud searched and captured?

Musiol

- The production is missing any responsive documents for RFPs Nos. 13-21 and 25-26 (i.e., documents and communications regarding: communications or meetings with TAG/Nathan or their services; communications or meetings with Wallace/Street Relations or their services; the decision to hire or work with Freedman or Liner Freedman; communications with Kjersti Flaa; communications with Content Creators concerning the Actions, Ms. Lively, Mr. Reynolds, any Wayfarer Defendant, or the Film; and phone records).
- The production is missing any responsive documents for RFPs Nos. 13-21 and 25-26. Please confirm that these requests were searched and there were no responsive materials.
- Several text messages including Musiol in other productions are missing from this production. See, e.g., BALDONI_000019084; BALDONI_000019462. Please explain what search terms were applied such that Musiol's production is missing responsive communications.

Dang

- Please explain the start and end date range applied to the Dang collection and search. It appears to range from approximately December 2022 through August 2024 (with nearly all documents dated between December 2022 and June 2023), but documents were requested through March 2025, when the subpoena was issued.
- The production is missing any responsive documents for RFP Nos. 5-26 (i.e., documents and communications regarding the Actions, scenario planning document, the January 4, 2024 meeting, allegations and grievances raised, communications with or regarding TAG/Nathan or their services, communications with or regarding Street/Wallace or their services, documents and communications with Flaa, and phone and billing records). Please confirm that these

requests were searched and there were no responsive materials.

- Several text messages including Dang in other productions are also missing from this production. See, e.g., TOSKOVIC_000000001-000000002, TOSKOVIC_000000520, TOSKOVIC_000000525, TOSKOVIC_000000420. Please explain what search terms were applied such that Dang's production is missing responsive communications.

Reese

- Please explain the start and end date range applied to the Reese collection and search. It appears to range from approximately June 2023 through August 2024, but documents were requested from December 2022 through March 2025, when the subpoena was issued.
- The production is missing any responsive documents for RFPs 9-14 and 19-20. (i.e., documents and communications regarding: communications with or involving TAG/Nathan; communications with or involving Wallace/Street Relations; the decision to hire or work with Freedman or Liner Freedman; and phone records). Please confirm that these requests were searched and there were no responsive materials.
- Several text messages including Reese in other productions are missing from this production. See, e.g., HEATH_000033543; TOSKOVIC_000000609. Please explain what terms were applied such that Reese's production is missing responsive communications.

Blackmon

- Please explain the start and end date range applied to the Blackmon collection and search. It appears to range from approximately June through December 2024, but documents were requested from December 2022 through February 2025, when the subpoena was issued. See RFP Nos. 6-9, 12-23.
- Please confirm that Blackmon has no documents relating to Freedman or Liner Freedman, Content Creators, Melissa Nathan or the Agency Group, Wallace or Street Relations, the Scenario Planning Document, the Actions, allegations of sexual harassment, or phone records.
- Although some text messages appear linked to Blackmon's personal email account, jarriesseblackmon@gmail.com, the production includes only text messages. Was this email searched and captured?
- Several text messages including Blackmon in other party productions are missing from this production. See, e.g., ABEL_000000296; HEATH_000032185. Please explain what terms were applied such that Blackmon's production is missing responsive communications.
- There are several documents in this production where the underlying content appears to be a video posted on social media but you have only provided a still screenshot of the video rather than the video content itself—please confirm resolution of this technical aspect. See, e.g., BLACKMON_000000294; BLACKMON_000000307; BLACKMON_000000320; BLACKMON_000000329; BLACKMON_000000340; BLACKMON_000000346; BLACKMON_000000347; BLACKMON_000000351; BLACKMON_000000352; BLACKMON_000000367; BLACKMON_000000370; BLACKMON_000000379; BLACKMON_000000064; BLACKMON_000000074; BLACKMON_000000102.

Marbory

- Please explain the end date range applied to the Marbory collection and search. It appears to

range from approximately January 2023 to December 2024, but documents were requested from December 2022 to March 2025, when the subpoena was issued.

- Please confirm that Marbory has no documents: (1) with or concerning TAG, Nathan, Abel, Freedman, Wallace, Street Relations, or Liner Freedman, and (2) no documents or communications with Content Creators. See RFP Nos. 9-15, 19-20.

Benson

- Please explain the date range applied to the Benson collection and search.
- Request No. 1 seeks all documents and communications concerning Ms. Lively, and Request No. 9 seeks all template privacy forms. In connection with these requests, Docusigns issued to Ms. Lively, as well as the underlying documentation (including draft contracts or agreements) are responsive. However, none were produced. Please confirm that Ms. Benson will produce this information.
- Ms. Benson produced a single email that she sent to Ms. Lively, notwithstanding the fact that Ms. Lively and her team exchanged numerous emails with Ms. Benson between March and April 2023. Ms. Benson similarly failed to produce any text messages with or concerning Ms. Lively. Please confirm that Ms. Benson will produce this information.

—
Kristin Bender

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